

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

THE CHESTER COUNTY HOSPITAL

v.

INDEPENDENCE BLUE CROSS,  
QCC INSURANCE COMPANY,  
KEYSTONE MERCY HEALTH PLAN


CIVIL ACTION NO. 02-CV-2746

STIPULATION

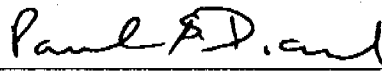
The recently filed motions listed below are based on substantially identical facts and issues of law. The parties to this litigation, and the non-parties who filed three of the below motions (Aetna, CIGNA, and MultiPlan), are attempting to negotiate a resolution of the motions. To facilitate that negotiation, the parties stipulate that June 23, 2003 shall be the response date for all the motions. Counsel for Defendants have obtained the consent of counsel for Aetna, CIGNA and MultiPlan to this extension.

1. Plaintiff The Chester County Hospital's Motion to Modify the Protective Order
2. (MultiPlan, Inc.'s) Motion to Intervene and/or Motion for Protective Order and Supporting Memorandum

3. Third Party's (CIGNA's) Objection and Motion for Protective Order and Memorandum in Support
4. Non-Party Aetna Inc.'s Motion to Intervene and for a Protective Order



Lewis R. Olshin  
Duane Morris LLP  
One Liberty Place, Suite 4200  
Suite 4200  
Philadelphia, PA 19103-7396  
Attorneys for Plaintiff,  
The Chester County Hospital



Thomas A. Leonard  
Paul S. Diamond  
William J. Leonard  
Obermayer Rebmann Maxwell & Hippel LLP  
One Penn Center, 19<sup>th</sup> Floor  
Philadelphia, PA 19103-1895  
Attorneys for Defendants,  
Independence Blue Cross, QCC Insurance  
Company, Keystone Health Plan East,  
and Keystone Mercy Health Plan

APPROVED AND SO ORDERED:

\_\_\_\_\_  
J.

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

THE CHESTER COUNTY HOSPITAL

v.

INDEPENDENCE BLUE CROSS,  
QCC INSURANCE COMPANY,  
KEYSTONE MERCY HEALTH PLAN

CIVIL ACTION NO. 02-CV-2746

**CERTIFICATE OF SERVICE**

I hereby certify that I have caused to be served a true and correct copy of the  
above Stipulation upon the following counsel via Facsimile and First Class Mail on the  
date indicated below:

Lewis R. Olshin, Esquire Duane Morris LLP One Liberty Place, Suite 4200 Philadelphia, PA 19102	Christopher T. Koegel, Esquire JONES DAY 51 Louisiana Avenue, NW Washington, DC 20001
James C. Crumlish, III, Esquire Elliott Reihner Siedzikowski & Egan, P.C. Union Meeting Corporate Center V P.O. Box 3010 925 Harvest Drive Blue Bell, PA 19422	Brian T. Must, Esquire METZ LEWIS 11 Stanwix Street 18 <sup>th</sup> Floor Pittsburgh, PA 15222



William K. Pelosi

Dated: June 16, 2003